MEMORANDUM

TO: Potential Best Available Retrofit Technology (BART)-Eligible Facilities

FROM: Vince Sagnibene

Administrator

Environmental Evaluation Division

DATE: November 4, 2002

RE: BART Eligibility Request

This letter is a request for information to be utilized by the Louisiana Department of Environmental Quality (LDEQ) in implementing the federal Regional Haze Regulations. In 1999, the United States Environmental Protection Agency (USEPA) issued regulations for the protection of visibility in National Parks and Wilderness Areas. These regulations require states to establish goals for improving visibility by developing long-term strategies for reducing emissions of air pollutants that cause visibility impairment. The State of Louisiana is meeting these requirements working as a member of the Central States Regional Air Planning Association (CENRAP). CENRAP is an organization of states, tribes, federal agencies and other interested parties working cooperatively to implement the Regional Haze Regulations. CENRAP includes the states and tribal areas of Nebraska, Kansas, Oklahoma, Texas, Minnesota, Iowa, Missouri, Arkansas, and Louisiana.

Louisiana is working jointly with neighboring states to provide for the placement of additional monitors, develop a shared emission inventory, and conduct modeling to help identify strategies that will reduce the haze. Each state will use these recommended strategies to develop a State Implementation Plan (SIP) to be filed with the USEPA. An early step in this process is to evaluate certain older, large emission units and determine whether these units require the installation of the best emission controls available. This is known as the BART requirement. Although the outcome of BART legislation is not definite at this time, CENRAP is working to develop an inventory of applicable sources.

BART applies to emission units that were in existence between the dates of August 7, 1962 and August 7, 1977 and that, individually or in combination with other BART-eligible sources at a stationary source, have the potential to emit 250 tons per year or more of any visibility-impairing pollutant (see Insert 2). The applicable pollutants are: ammonia (NH₃), nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter (PM₁₀ and PM_{2.5}) and volatile organic compounds (VOCs). Having commenced construction on or before August 7, 1977, BART-eligible sources were in existence prior to the Prevention of Significant Deterioration (PSD) permitting requirements of the 1977 Clean Air Act Amendments. Affected emission

units must fall into one of 26 source categories, including steam electric plants and industrial boilers, and large industrial plants such as pulp mills, refineries and smelters (see Insert 1).

Enclosed is a survey and additional materials that will help identify if your facility has BART-eligible emission sources. This survey and letter is also available for downloading from the LDEQ web site at http://www.deq.state.la.us/evaluation/eis/eisutil.htm. Please complete the survey and return it to Elizabeth McDearman at the following address no later than December 6, 2002.

Elizabeth McDearman LDEQ/OEA/EED Emissions Inventory Unit-5th Floor P.O. Box 82178 Baton Rouge, LA 70884-2178

To assist you in making the BART determination, we have included definitions and guidance material in Insert 2. The *Proposed Guidelines for Best Available Retrofit Technology (BART) Determinations Under the Regional Haze Regulations* is also available at EPA's website at http://www.epa.gov/ttn/oarpg/t1/fr notices/bart6-21.pdf. If you have any questions, please contact Elizabeth McDearman at (225) 765-0303.

Encl: Insert 1 & 2 and Survey Form

Insert 1

Source Categories Eligible for BART:

- 1. Fossil-fuel fired steam electric plants of more than 250 million Btu/hr heat input
- 2. Coal cleaning plants (with thermal dryers)
- 3. Kraft pulp mills
- 4. Portland cement plants
- 5. Primary zinc smelters
- 6. Iron and steel mill plants
- 7. Primary aluminum ore reduction plants
- 8. Primary copper smelters
- 9. Municipal incinerators capable of charging more than 250 tons of refuse per day
- 10. Hydrofluoric, sulfuric, and nitric acid plants
- 11. Petroleum refineries
- 12. Lime plants
- 13. Phosphate rock processing plants
- 14. Coke oven batteries
- 15. Sulfur recovery plants
- 16. Carbon black plants (furnace plants)
- 17. Primary lead smelters
- 18. Fuel conversion plants
- 19. Sintering plants
- 20. Secondary metal production plants
- 21. Chemical process plants
- 22. Fossil-fuel boilers (or combinations thereof) totaling more than 250 million Btu/hr heat input
- 23. Petroleum storage and transfer facilities with a total storage capacity exceeding 300,000 barrels
- 24. Taconite ore processing facilities
- 25. Glass fiber processing plants
- 26. Charcoal production facilities

Insert 2

"Proposed Guidelines for Best Available Retrofit Technology (BART) Determinations Under the Regional Haze Regulations," Federal Register Vol. 66, No. 140, starting at pg. 38108 [http://www.epa.gov/ttn/oarpg/t1/fr_notices/bart6-21.pdf]

Stationary source means all of the pollutant emitting activities which belong to the same industrial grouping (i.e., have the same two-digit SIC code), are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). [40CFR51.301]

In existence means that the owner or operator has obtained all necessary pre-construction approvals or permits required by Federal, State, or local air pollution emissions and air quality laws or regulations and either has (1) begun, or caused to begin, a continuous program of physical on-site construction of the facility or (2) entered into binding agreements or contractual obligations, which cannot be cancelled or modified without substantial loss to the owner or operator, to undertake a program of construction of the facility to be completed in a reasonable time. [40CFR51.301]

The potential emissions of all emission units falling within the 15-year BART window and within any of the 26 source categories (units are not required to be in the same category) must be aggregated for comparison to the 250-ton/year threshold. For the two source categories, fossil-fuel fired steam electric plants of 250 million Btu/hr heat input and fossil fuel boilers (or combinations thereof) totaling more than 250 million Btu/hr heat input, the proposed rule (subject to change) requires that the maximum heat input rates of all individual emission units falling within the BART window first be aggregated for comparison to the 250-million Btu/hr threshold. For petroleum storage and transfer facilities, the capacities of all storage tanks falling within the BART window must first be aggregated for comparison to the 300,000-barrel threshold. The total potential emissions of these such units or tanks, along with all other emission units falling within the BART window and within any of the 26 source categories, must then be compared to the 250-ton/year threshold to determine BART eligibility. Note, in the final rule EPA may choose not to aggregate boilers on the basis of heat input rate, but instead, apply the 250-million Btu/hr threshold to individual fossil-fuel boilers. Therefore, all boilers should be listed individually for purposes of this preliminary assessment. (See proposed rule for more detail.)

Best Available Retrofit Technology (BART)-Eligible Survey

| Facility: Facility EIS ID#: | AI #: |
|--|--|
| Contact Name: Mailing Address: | |
| Phone: Fax: E-mail address: | |
| Step 1. Are there any emissions units at this facility that fit categories that apply. | within one of the 26 categories listed below? Check the |
| ☐ Fossil fuel fired steam electric plants with a combined total of more than 250 million British thermal units (BTUs) per hour heat input ☐ Coal cleaning plants (thermal dryers) ☐ Portland cement plants ☐ Primary zinc smelters ☐ Primary aluminum ore reduction plants ☐ Primary copper smelters ☐ Municipal incinerators capable of charging more than 250 tons of refuse per day ☐ Hydrofluoric, sulfuric, and nitric acid plants ☐ Phosphate rock processing plants ☐ Carbon black plants (furnace process) ☐ Fossil fuel fired boilers with a combined total of more than 250 million BTUs per hour heat input ☐ Petroleum storage and transfer facilities with a combined capacity exceeding 300,000 barrels | ☐ Kraft pulp mills ☐ Lime plants ☐ Sintering plants ☐ Coke oven batteries ☐ Primary lead smelters ☐ Iron and steel mill plants ☐ Sulfur recovery plants ☐ Petroleum refineries ☐ Chemical process plants ☐ Taconite ore processing facilities ☐ Charcoal production facilities ☐ Glass fiber processing plants ☐ Fuel conversion plants ☐ Secondary metal production facilities |
| ☐ No emission source at this facility falls into one of the 26 categories listed above. If any emission unit can be placed in one of the above categories, proceed to Step 2. | |
| If no emission units can be placed in one of the above categories, proceed to Conclusion. | |

Step 2. Does any emission unit that belongs to one of the 26 categories from Step 1 meet the following two tests?

| Was the emission unit in existence on August 7, 1977 <u>AND</u> did it begin operation at some point after August 7, 1962? ☐ Yes ☐ No |
|---|
| If 'Yes' for even one emission unit, proceed to Step3. |
| If 'No' for every emission unit listed in one of the 26 categories from Step 1, proceed to Conclusion. |
| Step 3. Identify the "stationary source" (or sources) that includes the emission units identified in Step 2. Add the potential emissions (PTEs) from all emission units identified in Steps 1 and 2 that are included within the stationary source boundary. Are the PTEs from the emission units within the stationary source 250 tons or more per year of any visibility-impairing pollutant? If so, please check the visibility-impairing pollutant. |
| □ Sulfur dioxide (SO₂) □ Nitrogen oxides (NO_x) □ Particulate matter smaller than 10 micrometers (PM₁₀) □ Volatile organic compounds (VOCs) □ Ammonia |
| Proceed to Conclusion. |
| Conclusion |
| If the facility has even one emission unit that falls into one of the 26 categories listed in Step 1, began operation after August 7, 1962 and was in existence on August 7, 1977 and has the potential to emit more than 250 tons per year of any visibility-impairing pollutant, the facility has a BART-eligible source. Note that the PTEs from Step 3 are PTEs from all units within a stationary source that have met the criteria set forth in Steps 1 and 2. If the collective PTE for the emission units defined in Steps 1 and 2 in a stationary source is 250 tons or more, those units within that stationary source are BART-eligible. If an emission unit only satisfies one or two of the three conditions but does not meet a third condition, it is not BART-eligible. |
| □ This facility has BART-eligible emission units. Please attach a list of all BART-eligible emission units with this survey. The list should include all BART-eligible emission units, their PTEs and their Permit Emission Point ID from the most recent permit issued by the LDEQ and the NEDS ID from the Emissions Inventory Submittal. Please also include a BART-contact name and phone number. |
| ☐ This facility does not have any BART-eligible emission units. |
| LDEQ will contact the facility at a later date to discuss the results of this survey to |

I certify that this document and all attachments were prepared under my direction or supervised by qualified personnel. The information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Please mail a survey that has an original signature. A copied or faxed signature is unacceptable.